

Paul B. Maslo (admitted *pro hac*)  
Andrew J. Dressel (admitted *pro hac*)  
NAPOLI SHKOLNIK PLLC  
360 Lexington Avenue, 11th Floor  
New York, New York 10017  
Telephone: (212) 397-1000  
Fax: (646) 843-7603  
Email: pmaslo@napolilaw.com  
adressel@napolilaw.com

*Counsel for Plaintiffs*

RANDALL W. EDWARDS (S.B. #179053)  
redwards@omm.com  
MATTHEW D. POWERS (S.B. #212682)  
mpowers@omm.com  
DAMALI A. TAYLOR (S.B. #262489)  
dtaylor@omm.com  
ADAM M. KAPLAN (S.B. #298077)  
akaplan@omm.com  
O'MELVENY & MYERS LLP  
Two Embarcadero Center, 28th Floor  
San Francisco, California 94111-3823  
Telephone: (415) 984-8700  
Facsimile: (415) 984-8701

*Counsel for Defendants*

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

MARTIN DULBERG, individually, and on  
behalf of all others similarly-situated,

Plaintiff,

v.

UBER TECHNOLOGIES, INC., and  
RASIER, LLC,

Defendants.

Case No. 3:17-cv-00850-WHA

**JOINT PROPOSAL FOR DISTRIBUTION  
OF CLASS NOTICE**

Judge: The Honorable William H. Alsup

1 Pursuant to the Court's Order granting class certification [Dkt. No. 80], Plaintiff Martin Dulberg  
2 and Defendants Uber Technologies, Inc. and Rasier, LLC (collectively, "Uber") submit this joint  
3 proposal for distribution of class notice.

4 Notice Plan: Within 10 days of the Court's Order approving the parties' notice proposal, Uber  
5 shall produce the Class List (defined below) to the Class Administrator (defined below). The Class  
6 Administrator will send notice, substantially similar to that attached as Exhibit A, by e-mail to the  
7 class members' e-mail addresses currently on file with Uber by approximately March 22, 2018. The  
8 Class Administrator shall follow-up on any e-mails that are returned as undelivered in an effort to  
9 locate those class members whose e-mail addresses have changed or have otherwise been disabled.  
10 The parties agree to cooperate in good faith to make reasonable efforts to locate class members for  
11 whom notice is returned as undeliverable.

12 Class List: To facilitate distribution of notice, Uber shall provide, on a confidential basis, a list  
13 containing class members' names and e-mail addresses to the Class Administrator. Uber declines at  
14 this juncture to provide Plaintiff's counsel with class members' contact information.

15 Class Members: Notice will be sent to the 4,594 individuals identified in Exhibit B. These  
16 individuals are members of the following defined class:

17 All persons nationwide who (1) drove for UberX or Uber Select; (2) opted out of arbitration;  
18 (3) transported a passenger who was charged an upfront Fare before May 22, 2017, when  
19 Uber issued its updated fee addendum; and (4) made less money overall on rides where they  
20 transported passengers who were charged an upfront Fare because they were paid on a Fare  
21 calculated based on actual time and distance values instead of the upfront Fare calculated  
22 based on estimated time and distance values.

23 Opt-Out: Class members may opt-out of the class by mailing a signed written request for  
24 exclusion, as detailed in the proposed notice attached as Exhibit A, to the Class Administrator within  
25 30 days from the date the notice is e-mailed to them.

26 Class Administrator: Angeion Group, 1801 Market Street, Suite 660, Philadelphia, PA 19103,  
27 shall serve as the Class Administrator. Dulberg shall pay the Class Administrator's costs for  
28 distribution of notice.

1 DATED: March 1, 2018

Respectfully submitted,

/s/ Paul B. Maslo

Paul B. Maslo (admitted *pro hac*)  
Andrew J. Dressel (admitted *pro hac*)  
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New York, New York 10017  
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Fax: (646) 843-7603  
Email: pmaslo@napolilaw.com  
adressel@napolilaw.com

*Counsel for Plaintiffs*

Respectfully submitted,

/s/ Randall W. Edwards

RANDALL W. EDWARDS (S.B. #179053)  
redwards@omm.com  
MATTHEW D. POWERS (S.B. #212682)  
mpowers@omm.com  
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*Counsel for Defendants*

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**CERTIFICATE OF SERVICE**

The undersigned attorney certifies that on March 1, 2018, he electronically filed a copy of the attached via the CM/ECF filing system, which sent notification of such filing to all Filing Users.

/s/ Paul B. Maslo